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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	Case No. 3:17-cv-00_____
	)	
v.	)	<b>FILED <i>EX PARTE</i></b>
	)	<b>AND UNDER SEAL</b>
PETER YURYEVICH LEVASHOV,	)	
a/k/a "Petr Levashov," "Peter Severa,"	)	
"Petr Severa," and "Sergey Astakhov",)	)	
	)	
Defendant.	)	

**MOTION FOR TEMPORARY RESTRAINING ORDER AND  
ORDER TO SHOW CAUSE RE PRELIMINARY INJUNCTION**

Plaintiff, the United States of America, by and through its attorneys, Bryan Schroder, Acting United States Attorney for the District of Alaska, Kenneth A. Blanco, Acting Assistant Attorney General, Richard L. Pomeroy, Yvonne Lamoureux and Adam Alexander, Assistant United States Attorneys, and Ethan Arenson, Harold Chun and Frank Lin, Trial Attorneys, respectfully moves *ex parte*, pursuant to Title 18, United States Code, Sections 1345 and 2521 and Rule 65(b) of the Federal Rules of Civil Procedure, for a Temporary Restraining Order and Order to Show Cause Re Preliminary Injunction.

1. As more fully set forth in the attached Memorandum of Law, the Defendant is responsible for the operation of a sophisticated malware named Kelihos. Kelihos is malware that distributes spam, distributes malware, such as

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ransomware, and harvests credentials. Kelihos is a malware designed to create a peer to peer botnet, that is, it looks to infect a large number of computers and furthers its infections and malicious activities by communicating with other infected computers. The Kelihos botnet has been known to have infected more than 100,000 computers worldwide at a single time, with some of those infected computers residing in the District of Alaska and elsewhere in the United States.

2. To halt this conduct, the United States requests that this Court enter the proposed Temporary Restraining Order, which commands the Defendant to cease his criminal activity, authorizes the Government to undertake a technical disruption of the Defendant's malware infrastructure, and orders the Defendant to appear before this Court and show cause, if any, why a preliminary injunction should not be issued.

WHEREFORE, the Government requests that the Court enter the proposed Order.

RESPECTFULLY SUBMITTED, on April 4th, at Anchorage, Alaska.

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